Draft key. Public is invited to comment only on the proposed Permit changes as shown below:

Class 1
Class 1*
Class 3
Additions made that don't fall under the above mentioned MODs
~~Removed 2004 Permit text~~

This box and the formatted text changes will be removed and the appropriate dates will be inserted prior to the Permit's final sign off.

California Environmental Protection Agency
Department of Toxic Substances Control

HAZARDOUS WASTE FACILITY PERMIT

Permit Number: 04-SAC-08

Facility Name: KW Plastics of California
1861 Sunnyside Court
Bakersfield, CA 93308

Owner Name: Three Notch, Incorporated and
Blind Jack Road, Inc.
Sanders Road
Troy, AL 26081

Operator Name: KW Plastics of California
1861 Sunnyside Court
Bakersfield, CA 93308

Facility EPA ID Number:
CAD982435026

Effective Date: July 28, 2004
Expiration Date: July 28, 2014
Permit Modification History:
Class 3 *June 28, 2004*
Class 1
Class 1*
Class 3

Modification No.:
MOD3 NC1-2007-026

~~Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA) equivalent Hazardous Waste Facility Permit is hereby issued to KW Plastics of California.~~ Pursuant to Section 66270.42 of the California Code of Regulations, the Hazardous Waste Facility Permit issued July 28, 2004, effective July 28, 2014 (Permit), is hereby modified to correct typographical errors and to incorporate revisions to the Part B Permit Application for the Hazardous Waste Facility Permit for KW Plastics of California (Part B), which sets forth the conditions to which the Permit is subject. **The Part B is revised to include a modernized wastewater tank treatment process.** The issuance of this Permit is subject to the conditions set forth in Attachment ~~A~~ "A" and the Part B Application (Operation Plan) **dated April 28, 2006, revised March 21, 2007 and August 3, 2007**. The Attachment ~~A~~ "A" consists of 13 pages.

James M. Pappas, P.E, Chief
Northern California Permitting and
Corrective Action Branch
Department of Toxic Substances Control
Date:

KW PLASTICS OF CALIFORNIA
1861 SUNNYSIDE COURT
BAKERSFIELD, CALIFORNIA 93308
HAZARDOUS WASTE FACILITY PERMIT
ATTACHMENT "A"

TABLE OF CONTENTS

PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.

2. "Permittee" as used in this Permit means the Owner and Operator.

3. Unless explicitly stated otherwise, all references to items in this Permit shall refer only to items occurring within the same part.

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. OWNERS
Three Notch, Incorporated and Blind Jack Road, Inc

2. OPERATOR
KW Plastics of California

3. LOCATION
The Facility is located at 1861 Sunnyside Court in Bakersfield, Kern County, California (Facility). Permanent access to the Facility is provided by Pegasus Drive which is a quarter of a mile east of California State Highway 99. The Facility's property is zoned M- 2 H PD, by Kern County. The legal description of the Facility is as follows: Parcel 3 of Parcel Map 7105, recorded in Book 31 of Parcel maps at Page 89 in the County's Recorder's Office being in the southeast 1/4 of Section 3, Township 29 south, Range 27, M.D.M, Kern County, California. See Attachment ~~B~~ "B" for the Location Map.

4. DESCRIPTION
The Facility occupies 6.1 acres of land in a suburban region of Kern County that is largely characterized as industrial and commercial. The Facility recycles hazardous waste polypropylene chips recovered from off-site battery crushing operations. The ~~polyproylene~~ polypropylene chips are received at the Facility by trucks and placed in a stainless steel receiving hopper. Chips are moved, via a stainless steel auger, to a conveyor belt and then into a stainless steel float separator (Tank ~~"C"~~ 1) where the chips are washed, rinsed, and floated. **Water adhered to the washed chips exiting Tank 1 is collected in a water recycling tank (Tank 2) and filtered and returned to Tank 1 as make-up water**. The ~~Chips~~ chips are then sent ~~to a~~ **through a** stainless steel ~~granular~~ **grinder** , which reduces the chips to less than 3/8-inch in size. After size reduction, the polypropylene chips are discharged into a ~~second float separator~~ **wash tank** (Tank ~~"C"~~ **3**). **The chips are augered out of Tank 3 and into a spin dryer mounted on top of a water recycling tank (Tank 4). The collected water in Tank 4 is filtered and pumped back into Tank 3. As the chips are spun in the spin dryer, the dry chips are discharged through the top of the spin dryer and into an agitated wash tank (Tank 5). As the chips pass through the tank's four chambers, the turbulence created by the agitators causes paper or other debris still attached to the chips to separate from the chips. After washing, a chip and water slurry is pumped into a second spin dryer mounted on top of a water recycling tank (Tank 6). The spin-dried chips are discharged from the spin dryer into the rinse tank (Tank 7) and the water collected in Tank 6 is filtered**

and returned to Tank 5. Tank 7 is used to remove remaining paper or other small debris from the chips prior to entering the production process. After rinsing, the chips are augered from Tank 7 into a final spin dryer mounted on top of a water recycling tank (Tank 8). The water collected in Tank 8 is filtered and reused in Tank 7. After exiting the final spin dryer, the clean, size-reduced polypropylene chips are transported to a drying tower prior to onsite storage or immediate introduction into a melt-extruding system.

In the extruding system, plastic resin additives are mixed with the granulated plastic to produce finished products which vary based on customer specifications. The resin-granulated plastic mixture is then melted to an approximate temperature of 400 degrees Fahrenheit and extruded into pelletized form. Finished pellets are stored in silos and utilized in the production of various plastic products, such as battery casings or paint cans.

A 7,800-gallon water recovery tank (Tank 9) intermittently contains water removed from Tanks 1, 3, 5, and 7 during maintenance activities. Wastewater is generated periodically when debris and sludge from Tanks 1, 3, 5, and 7 are removed, via augers located in the bottom of these tanks. Storm water collected within the trailer parking area is also pumped into Tank 9. Wastewater from Tank 9 is treated using a plate filter press. The filter cake and other non-recycled contaminants are baled and placed in temporary storage (less than 90 days) until removal to an approved Class 1 land disposal facility. Wastewater from the filter press is pumped to a 7,800-gallon holding tank (Tank 10) where it is sampled and analyzed for lead concentrations prior to discharge. If sampling analysis indicates that lead is present at hazardous concentrations, the water is pumped back to the water recovery tank (Tank 9) for further treatment. If the wastewater from the filter press (as sampled at Tank 10) is non-hazardous, it is discharged to the water storage ponds for temporary storage, until the water can be recycled in the tank treatment system. See Attachment ~~B~~ "B" for the ~~Process Plan and~~ Process Flow Diagram.

~~The wastewater from float separators (Tank "C" and Tank "G") is flown to the water recovery tank (Tank "P") for treatment. Wastewater from Tank "P" flows through a filter press before going to the holding tank (Tank "U"). The water in Tank "U" is tested for lead, and if the results show that the water is lead-free, it is flown to the water storage ponds for reuse as make-up water for float separators Tank "C" and Tank "G". However, if the test results show that the water in Tank "U" is still hazardous, it is flown back to Tank "P" for additional filtering.~~

5. FACILITY SIZE AND TYPE FOR FEES
The Facility is categorized as a large treatment facility pursuant to Health and Safety Code sections 25205.1 and 25205.19.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

   (a) The Part A Application dated December 22, 2003, the Part B Application (Operation Plan) dated December 22, 2003, Permittee's response to January 29, 2004, DTSC's letter dated February 12, 2004, ~~and~~ Permittee's response to DTSC's April 5, 2004 letter dated April 14, 2004**, Permittee's amended Operation Plan addendum titled "Existing Treatment Units Closure Plan" dated June 26, 2007, and the Part "B" Application (Operation Plan) dated April 28, 2006 (revised March 21, 2007 and August 3, 2007)** are hereby made a part of this Permit by ~~references~~ reference.

2. EFFECT OF PERMIT

   (a) The Permittee shall comply with the provisions of the Health and Safety Code and the regulations adopted by DTSC pursuant thereto. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.

   (b) The Permittee is permitted to treat polypropylene chips in accordance with the conditions of this Permit. Any treatment or storage of hazardous wastes not specifically authorized in this Permit is strictly prohibited.

   ~~(c)~~ (c) Compliance with the terms of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.

   (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.

   (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.

(f) In addition, failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (California Code of Regulations, title 22, section 66270.43).

(g) In case of conflicts between the approved Operation Plan ~~of April 14, 2004~~ **dated April 28, 2006, revised March 21, 2007 and August 3, 2007,** and the Permit, the Permit conditions take precedence.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A CEQA Statement of Findings and a CEQA Notice of Determination **(Notice of Exemption)** have been prepared in accordance with the requirements of California Public Resources Code section 21094 and California Code of Regulations, title 14, section 15153.

4. ENVIRONMENTAL MONITORING

On April 25, 1994, DTSC finalized a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) Report in which DTSC designated four Solid Waste Management Units (SWMU's) as follows: SWMU Unit Number 1 (Truck Loading and Unloading Hopper), SWMU Number 2 (Trailer Parking Area), SWMU Number 3 (Recovery Ponds), SWMU Number 4 (Plastic Recycling Room), and one Area of Concern (Drainage Trough in Production Area).

On December 28, 1994, the Permittee submitted a RCRA Facility Investigation (RFI) Workplan to DTSC. The RFI Workplan was approved by DTSC on September 12, 1995. The Permittee conducted the field investigation in October 1995, which included the collection of seven water samples, two sediment samples, and sixty-four soil samples. Subsequently, the Permittee submitted the sampling results in a RFI Report to DTSC on December 12, 1995. DTSC approved the RFI Report on January 9, 1996, and concluded that the Facility needed no further action. Therefore, no monitoring requirements are warranted at this time.

5. WASTE MINIMIZATION CERTIFICATION

Pursuant to Health and Safety Code section 25202.9, the Permittee shall certify annually, by March 1 for the previous year ending December 31, that:

(a) The Facility has a program in place to reduce the volume and toxicity of all hazardous wastes pursuant to Section 12 of the Operation Plan.

(b) The method of treatment is the only practicable method currently available to the Facility which minimizes the present and future threat to human health and the environment.

The Permittee shall make this certification, in accordance with California Code of Regulations, title 22, section 66270.11. The Permittee shall submit the certification to James M. Pappas, P.E., Chief, DTSC's Northern California Permitting and Corrective Action Branch and shall record and maintain onsite such certification in the Facility Operating Record.

6. WASTE MINIMIZATION CONDITIONS

The Permittee shall comply with the Hazardous Waste Source Reduction and Management Review Act (SB 14) requirements that are specified in the Health and Safety Code sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable statutes or the regulations adopted by DTSC pursuant thereto. This would include submittal of SB 14 documents to DTSC upon request. DTSC may require the Permittee to submit a more detailed status report explaining any deviation from, or changes to, the approved waste minimization plan.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit only authorizes treatment activities in the units listed below. The Permittee shall not treat hazardous waste in any unit other than those specified in this Part. Any modification to a unit or activity authorized by this Permit requires the written approval of DTSC in accordance with the permit modification procedures set forth in California Code Regulations, title 22.

UNIT NAME **AND STATUS**:

Permitted Unit	Tank Designation	Status of Unit
Receiving Hopper	**na**	**Active**
Float Separator Tank	**C**	**Pending closure**
Float Separator Tank	**G**	**Pending closure**
Storm Water Collection Sump	**na**	**Active**
Wastewater Tank	**P**	**Pending closure**
Holding Water Tank	**U**	**Pending closure**
Filter Press	**na**	**Active**
Float Separator Tank	**1**	**Active**
Water Recycling Tank for Tank 1	**2**	**Active**
Wash Tank	**3**	**Active**
Water Recycling Tank for Spin Dryer 1	**4**	**Active**
Wash Tank	**5**	**Active**
Water Recycling Tank for Spin Dryer 2	**6**	**Active**
Rinse Tank	**7**	**Active**
Water Recycling Tank for Spin Dryer 3	**8**	**Active**
Water Recovery Tank	**9**	**Active**
Holding Tank	**10**	**Active**

na: not applicable.

~~Receiving Hopper~~
~~Float Separator Tank "C"~~
~~Float separator Tank "G"~~
~~Storm Water Collection Sump~~
~~Wastewater Tank "P"~~
~~Holding Water Tank "U"~~
~~Filter Press~~

LOCATION:

All the units are located in the Recycling Process Room (Room), or outside of the Room (only the Receiving Hopper). Secondary ~~containments are~~ containment is required for all the units. See the Process Flow Diagram in Attachment ~~B~~ "B".

ACTIVITY TYPE:

Treatment and recycling of polypropylene chips in tank systems.

ACTIVITY DESCRIPTION:

Polypropylene chips are treated and recycled for reuse at this Facility. See the Process Flow diagram in Attachment B for further information.

ACTIVITY DESCRIPTION:

Polypropylene chips are treated and recycled for reuse at this Facility. See the Process Flow diagram in Attachment B for further information.

MAXIMUM CAPACITY **(* denotes pending closure):**

Receiving Hopper	31,207 tons per year or a maximum of 2,600 tons per month
Tank "C" *	4,500-gallon ~~gallons~~ tank in a 40-foot by 7-foot by 8-foot structure
Tank "G" *	2,800-gallon ~~gallons~~ tank in a 15-foot by 7-foot by 8 foot structure
Tank "P" *	5,000-gallon ~~gallons~~ tank in a 15-foot by 7-foot by 8-foot structure
Tank "U" *	500-gallon ~~gallons~~ holding tank
Tank 1	**6,697-gallon tank in an 8-foot by 20-foot by 7.4-foot structure**
Tank 2	**280-gallon tank in a 4-foot by 4-foot by 2.3-foot structure**
Tank 3	**6,697-gallon tank in an 8-foot by 20-foot by 7.4-foot structure**
Tank 4	**360-gallon tank in a 4-foot by 5.9-foot by 2-foot structure**
Tank 5	**5,386-gallon tank in a 12-foot by 12-foot by 5-foot structure**
Tank 6	**540-gallon tank in a 4-foot by 5.9-foot by 3-foot structure**
Tank 7	**6,697-gallon tank in an 8-foot by 20-foot by 7.4-foot structure**
Tank 8	**360-gallon tank in a 4-foot by 5.9-foot by 2-foot structure**
Tank 9	**7,800-gallon tank in a 10-foot diameter by 14.7-foot high structure**
Tank 10	**7,800-gallon tank in a 10-foot diameter by 14.7-foot high structure**

WASTE TYPES:

The hazardous wastes treated, recycled, and/or generated at the Facility include lead-contaminated polypropylene chips, lead-contaminated wastewater, and lead-contaminated debris and filter ~~cakes~~ cake.

RCRA HAZARDOUS WASTE CODES:

Federal Waste Code: D008

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS (SUBPART CC)

The Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5, Air Emission Standards because the Facility does not handle, store, treat, or dispose of any volatile organic compounds.

PART V. SPECIAL CONDITIONS WHICH APPLY TO ALL OF THE FACILITY'S TREATMENT UNITS.

1. Within 120 days of the effective date of this Permit, the Permittee shall provide DTSC with a comprehensive noise reduction program pursuant to Cal/OSHA hearing programs, if workers using noise-producing equipment on-site are exposed to noise levels exceeding Cal/OSHA standards[1a].

   1a. Item completed per requirement of special condition in 2004 ("Hearing Conservation Program" submitted to DTSC November 23, 2004).

2. The Permittee shall comply with the sampling requirements in the approved Operation Plan which includes sampling of polypropylene chips at the Receiving Hopper, ~~Tank "G", Tank "U",~~ **Tank 10 (holding tank),** Water Storage Ponds, and filter ~~Cakes~~ cakes and reject chips **(hazardous baled waste).**

3. The Permittee shall apply to DTSC for a Generator Identification Number within 90 days from the effective date of this Permit[3a] and shall remove the generated solid lead wastes from the Facility within 90 days from the date of the generation.

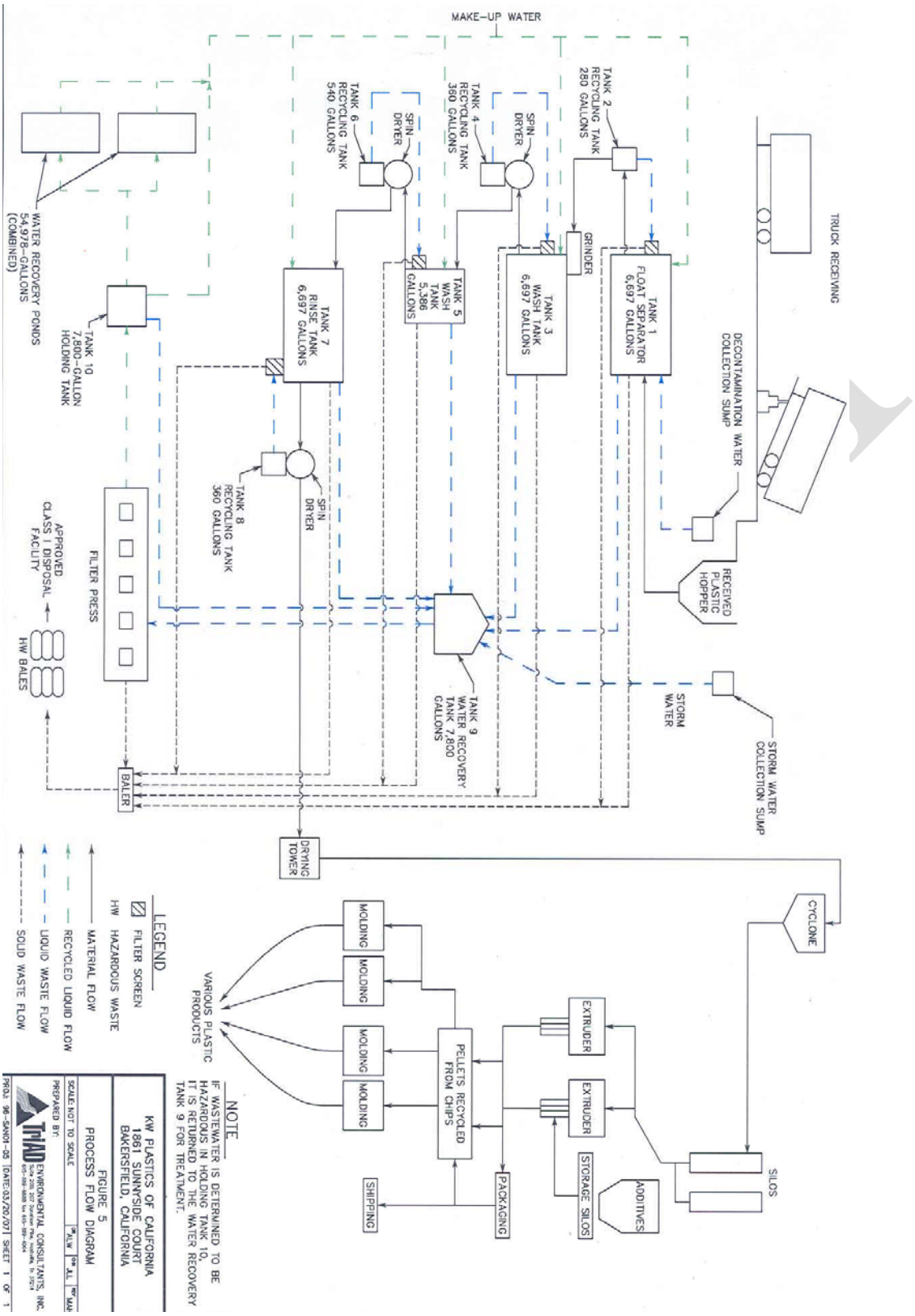
   3a. Item completed per requirement of special condition in 1986. KW Plastics of California's Generator ID number is CAD 982435026 (Same as Facility EPA ID No.).

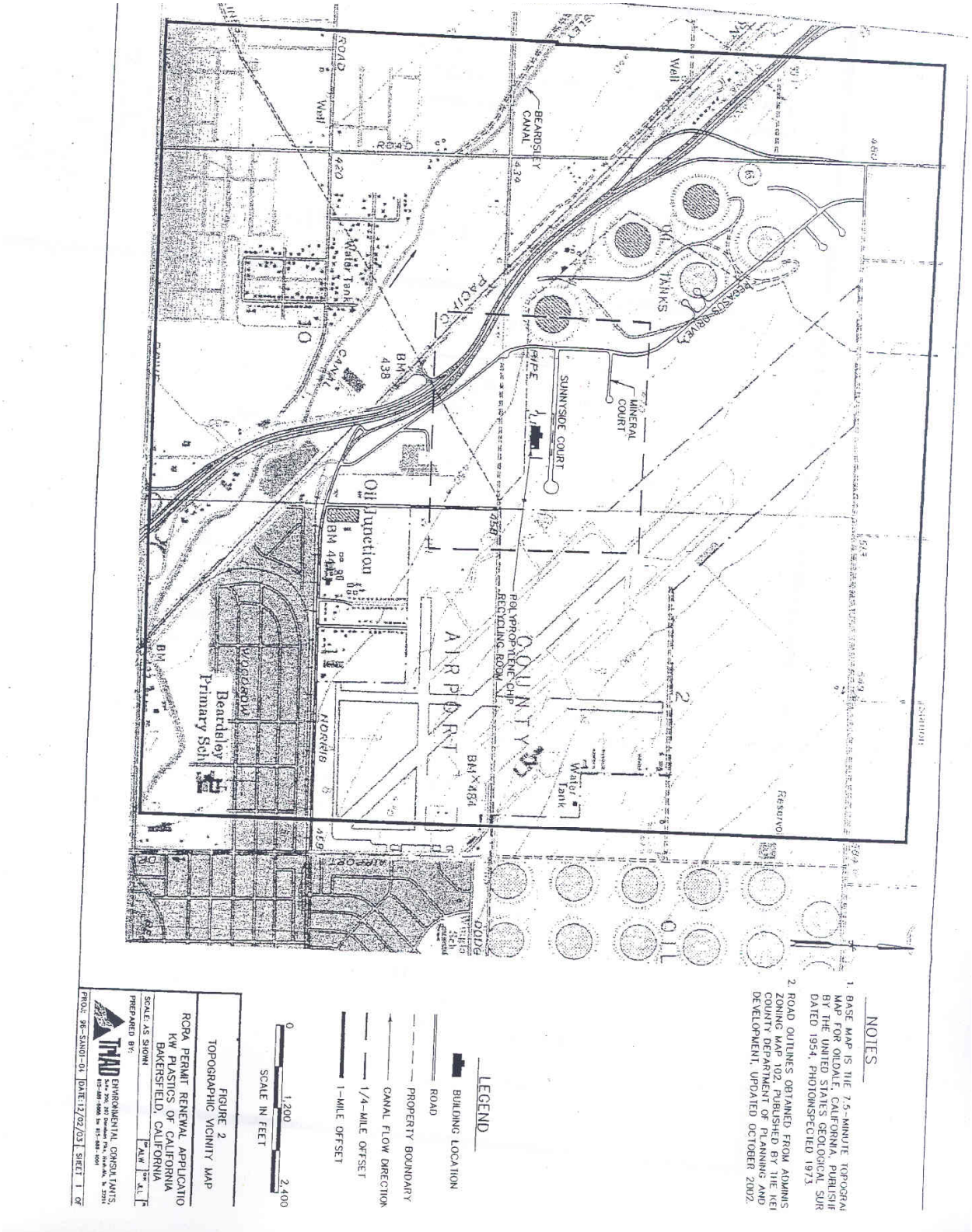
4. The Permittee is prohibited from discharging any hazardous wastes or solid wastes into the recovery ponds. The recovery ponds are restricted for the storage of non-hazardous recycled water which is later used as make-up water for the washing of the polypropylene chips.

PART VI - CORRECTIVE ACTION

1. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.

2. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment. Any required corrective action shall be carried out either under a corrective action consent agreement or an enforcement order pursuant to Health and Safety Code section 25187.


MAKE-UP WATER
TRUCK RECEIVING
DECONTAMINATION WATER COLLECTION SUMP
RECEIVED PLASTIC HOPPER
TANK 1 FLOAT SEPARATOR 6,697 GALLONS
GRINDER
TANK 2 RECYCLING TANK 280 GALLONS
SPIN DRYER
TANK 4 RECYCLING TANK 360 GALLONS
SPIN DRYER
TANK 6 RECYCLING TANK 540 GALLONS
SPIN DRYER
TANK 3 WASH TANK 6,697 GALLONS
TANK 5 WASH TANK 5,386 GALLONS
TANK 7 RINSE TANK 6,697 GALLONS
WATER RECOVERY PONDS 54,978-GALLONS (COMBINED)
TANK 10 7,800-GALLON HOLDING TANK
TANK 8 RECYCLING TANK 360 GALLONS
SPIN DRYER
FILTER PRESS
APPROVED CLASS I DISPOSAL FACILITY
HW BALES
TANK 9 WATER RECOVERY TANK 7,800 GALLONS
STORM WATER
STORM WATER COLLECTION SUMP
BALER
DRYING TOWER
CYCLONE
SILOS
ADDITIVES
STORAGE SILOS
EXTRUDER
EXTRUDER
PELLETS RECYCLED FROM CHIPS
PACKAGING
SHIPPING
MOLDING
MOLDING
MOLDING
MOLDING
VARIOUS PLASTIC PRODUCTS
LEGEND
FILTER SCREEN
HW HAZARDOUS WASTE
MATERIAL FLOW
RECYCLED LIQUID FLOW
LIQUID WASTE FLOW
SOLID WASTE FLOW
NOTE
IF WASTEWATER IS DETERMINED TO BE HAZARDOUS IN HOLDING TANK 10, IT IS RETURNED TO THE WATER RECOVERY TANK 9 FOR TREATMENT.
KW PLASTICS OF CALIFORNIA
1861 SUNNYSIDE COURT
BAKERSFIELD, CALIFORNIA
FIGURE 5
PROCESS FLOW DIAGRAM
SCALE: NOT TO SCALE
PREPARED BY:
TriAD ENVIRONMENTAL CONSULTANTS, INC.
PROJ: 06-SAN01-05 DATE: 03/20/07 SHEET 1 OF 1


NOTES
1. BASE MAP IS THE 7.5-MINUTE TOPOGRAPHIC MAP FOR OILDALE, CALIFORNIA, PUBLISHED BY THE UNITED STATES GEOLOGICAL SURVEY DATED 1954, PHOTOINSPECTED 1973.
2. ROAD OUTLINES OBTAINED FROM ADMINISTRATIVE ZONING MAP 102, PUBLISHED BY THE KERN COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT, UPDATED OCTOBER 2002.
LEGEND
BUILDING LOCATION
ROAD
PROPERTY BOUNDARY
CANAL FLOW DIRECTION
1/4-MILE OFFSET
1-MILE OFFSET
0
1,200
2,400
SCALE IN FEET
FIGURE 2
TOPOGRAPHIC VICINITY MAP
RCRA PERMIT RENEWAL APPLICATION
KW PLASTICS OF CALIFORNIA
BAKERSFIELD, CALIFORNIA
SCALE: AS SHOWN
PREPARED BY:
ENVIRONMENTAL CONSULTANTS,
PROJ: 96-SANDI-04 DATE:12/02/03 SHEET 1 OF
Well
BEARDSLEY CANAL
ROAD
Water Tank
PACIFIC
TANKS
PIPE
SUNNYSIDE COURT
MINERAL COURT
BM 438
Oil Junction
BM 484
AIR PORT
COUNTY
POLYPROPYLENE CHIP RECYCLING ROOM
Water Tank
Beardsley Primary Sch
MORRIS
OIL

ATTACHMENT "C"
Permit Modification History

Permit Modifications
All modifications made to this Permit and/or the Operations Plan (Part B) are listed and described in this Attachment.

June-2000. Facility-initiated a Class 3 Permit Modification to increase the volume of lead-impacted polypropylene from 11,500 tons per year to 31,207 tons per year.

-2007.

- **Facility initiated a Class 3 Permit Modification to allow for the modernization of the Facility's wastewater treatment system. The revisions are contained in the Part B dated April 28, 2006, revised March 21, 2007 and August 3, 2007.**
- **Facility-initiated a Class 1* Permit Modification to reflect changes in the closure plan for existing treatment units. The revisions are contained in the supplemental document "Existing Treatments Units Closure Plan" dated June 26, 2007.**
- DTSC-initiated a Class 1 Permit Modification to correct typographical errors in existing Permit.